

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JANNETTE GONZALEZ CLAUDIO

DEBTOR

CASE NO. 15-09164/ESL

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #49**

TO THE HONORABLE COURT:

NOW COMES, JANNETTE GONZALEZ CLAUDIO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 22, 2018, Scotiabank Puerto Rico ("Scotiabank") filed a Motion to Dismiss, docket #49, alleging that the Debtor has defaulted in her direct mortgage payments to said creditor in the amount of \$1,758.34 (2 monthly payments).

2. The Debtor met with the undersigned attorney regarding this matter and respectfully submits that she did incur in direct post-petition arrears due to certain economic problems.

3. The Debtor respectfully submits to this Honorable Court that she needs thirty (30) days within to obtain the funds to cure the mortgage loan arrears owed to Scotiabank.

4. Therefore, the Debtor requests thirty (30) days to file evidence of curing the mortgage loan arrears, which extension of time to expire on December 20, 2018.

WHEREFORE, the Debtor through her undersigned attorney respectfully requests this Honorable Court grant the present motion and grant the requested extension of time, in the above captioned case.

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I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor, to her address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 20th day of November, 2018.

/s/Roberto Figueroa Carrasquillo

USDC #203614

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